

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

VERIZON MARYLAND INC., Plaintiff vs. MONTGOMERY COUNTY, MARYLAND, Defendant.	Civil No.: MJG 06 CV 1663
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JOINT MOTION FOR STAY OF PROCEEDINGS

The parties jointly move that the Court enter an Order staying proceedings in this action until December 1, 2006 and state:

1. On August 17, 2006, the Court entered its Order, pursuant to 28 U.S.C. § 636 and Local Rules 301 and 302, referring this case to United States Magistrate Judge James K. Bredar for settlement or other ADR conferences.

2. In the course of those conferences, with the assistance of Magistrate Judge Bredar, the parties have reached agreement on the terms of a Cable Franchise Agreement and related matters, subject to approval by the Montgomery County Council (the "Council"). If such approval is obtained, the agreement will form the basis for settlement of this action.

3. Pursuant to Chapter 8A of the Montgomery County Code (the "Cable Law"), any proposed Cable Franchise must be submitted to the Council for approval in accordance with the procedures and time periods established in the Cable Law.

4. Under the procedures and time periods established in the Cable Law, action of the Council upon the proposed Cable Franchise is expected to be completed, in this case, by November 28, 2006.

5. A stay of all proceedings herein until December 1, 2006, will provide the necessary time to allow the parties to submit the proposed Cable Franchise Agreement to the Council and, if the Council's approval is obtained, to settle this action.

WHEREFORE, the parties respectfully request that proceedings in this action be stayed until December 1, 2006.

Respectfully submitted,

/s/*

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